

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

PARAGON COMPONENT
SYSTEMS, LLC,

Plaintiff,

v.

QUALTIM, INC., CENTER FOR
BUILDING INNOVATION, LLC,
DRJ ENGINEERING, LLC,
INSPIRED PURSUITS, LLC,
KIRK GRUNDAHL, and
SUZANNE GRUNDAHL,

Defendants.

Case No.: 1:24-cv-00246-CEA-CHS

**PLAINTIFF'S MOTION FOR A LIMITED INITIAL JURISDICTIONAL DISCOVERY
PERIOD AND TO STAY DEADLINE TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS**

Plaintiff Paragon Component Systems, LLC moves this Court for an Order granting leave to conduct limited jurisdictional discovery for a 75-day period solely for the purposes of responding to the allegations of Defendants' Motion to Dismiss (Doc. 21), and to stay the current deadline to respond to the Motion until 30 days after the completion of this limited initial jurisdictional discovery period. In support of its Motion, Plaintiff files a Memorandum of Law herewith. Plaintiff has conferred with Defendants, who oppose the relief sought by this motion.

Respectfully submitted this 24th day of October, 2024.

/s/ James T. Williams

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***Attorneys for Plaintiff Paragon Component
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CERTIFICATE OF SERVICE

I certify that on October 24, 2024 a copy of the foregoing Plaintiff's Motion for a Limited Initial Jurisdictional Discovery Period and to Stay Deadline to Respond to Defendants' Motion to Dismiss is being served on all counsel of record by electronically filing it via the Court's filing system.

MILLER & MARTIN PLLC

/s/ James T. Williams

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